

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

VIASAT, INC.,

Plaintiff,

vs.

**WESTERN DIGITAL CORPORATION
and WESTERN DIGITAL
TECHNOLOGIES, INC.,**

Defendants.

Case No.: 6:21-cv-01230-ADA

JURY TRIAL DEMANDED

PLAINTIFF'S NOTICE OF INTENT TO PROCEED WITH VENUE DISCOVERY

Plaintiff Viasat, Inc. files this Notice to inform all parties and the Court of its intent to proceed with venue discovery pursuant to the Court's April 14, 2022 Standing Order Governing Proceedings (OGP) 4.1 – Patent Cases and June 8, 2021 Amended Standing Order Regarding Venue and Jurisdictional Discovery Limits for Patent Cases.

On August 4, 2022, Defendant Western Digital Technologies, Inc. filed a motion to transfer venue to the Northern District of California under 28 U.S.C. § 1404(a). Viasat opposes.

According to the Court's OGP, venue discovery "shall be completed no later than 10 weeks after the filing of [the venue] motion." OGP at 5. "The deadline for plaintiff's response is 2 weeks after the completion of venue or jurisdictional discovery. The deadline for Defendant's reply is 2 weeks after the filing of the response." *Id.*

Accordingly, Viasat hereby provides notice of its intent to proceed with venue discovery and briefing pursuant to the below schedule:

Event	Deadline
Motion filed	August 4, 2022
Venue Discovery Cut-off	October 13, 2022
Viasat's Response Briefs	October 27, 2022
Defendants' Reply Briefs	November 10, 2022

Dated: August 4, 2022

Respectfully submitted,

/s/ Melissa R. Smith

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CERTIFICATE OF SERVICE

I certify that, on August 4, 2022, I electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF System, which will then send a notification of such filing (NEF) to all counsel of record.

/s/ *Melissa R. Smith*